



Fire Department

"Serving the community since 1926"

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John M. Scherrei
Fire Chief

November 9, 2007

Eric Gillies
Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
Email: gilliee@slc.ca.gov

Dear Mr. Gillies:

Subject: Draft Environmental Impact Report for PRC 421 Re-Commissioning Project

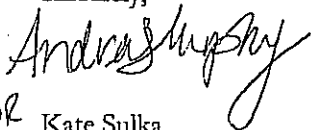
The Santa Barbara County Fire Department, Fire Prevention Division (FPD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the PRC 421 Re-Commissioning Project. FPD has the following comments:

1. The Draft EIR states in Impact HAZ-1 that several areas on-site potentially have soil and/or groundwater contamination and as a mitigation measure, a Phase I Environmental Site Assessment, Phase II Environmental Site Assessment and a Remedial Action Plan are recommended. Per our requirements, the Phase I Environmental Site Assessment shall be submitted to FPD for review and any subsequent workplans for soil and groundwater sampling shall be submitted to FPD for approval and incorporated into the current and ongoing assessment under our Site Mitigation Unit (SMU) Site # 371. This also applies to HAZ-1b and HAZ-1d on the Executive Summary Table ES.1 and in Section 3.2.2 Drilling From Platform Holly. Please add this in any additional sections citing the recommendation for these assessments upon decommissioning of the pier, not listed here.
2. The draft EIR does not mention FPD as an overseeing agency for soil and groundwater contamination. FPD is the local oversight agency within the County of Santa Barbara for soil and groundwater cleanup.
3. Section 2.5 Future Plans and Abandonment is incorrect in stating that site characterization and remediation is required upon decommissioning of a facility. Per Santa Barbara County Code, Chapter 18, Article VI. Reporting Requirements, Section 18-41, any person who is reliably informed of, or discovers a release of a hazardous substance within the County of Santa Barbara shall notify FPD within 10 working days after receiving that information or making that discovery. Furthermore, Article VII. Monitoring, Section 18-49, upon a determination that groundwater contamination exceeds FPD standards, characterization and cleanup is required. FPD is the local oversight agency within the County of Santa Barbara for soil and groundwater cleanup. Please make these changes in the EIR to reflect our requirements.
4. Santa Barbara County Fire Prevention Division, Site Mitigation Unit and Certified Unified Program Agency shall both be added to the Regulatory Setting Section, 4.1.2.
5. Section 4.5 Aquatic Environment: Change the CC-RWQCB to FPD as the overseeing agency.
6. Section 4.3 Hazardous Materials: The FPD files were not included in this summary. Please update this section with information obtained from the Site Mitigation Unit and Certified Unified Program Agency files as well as FPD's current release information (CIRs).

November 9, 2007

Thank you for the opportunity to comment on this document. If you have any questions or concerns, please contact me at 686-8169, or, Ms. Andrea Murphy at 686-8146.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrea Murphy".

for

Kate Sulka

Supervising Hazardous Materials Specialist

Santa Barbara County Fire Department

Fire Prevention Division

AM/KS:cc Pier 421 DEIR ltr with Kates coments.doc